FILED12 MAR '24 16 32 USDC-ORP

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA

3:24-cr-00095-IM

٧.

INDICTMENT

SOMPHACHANH ARB SOPHANTHAVONG 18 U.S.C. § 1029(a)(3)

18 U.S.C. § 1704

Defendant.

18 U.S.C. § 1708 18 U.S.C. § 2

COUNT 1

(Possession of Fifteen or More Counterfeit or Unauthorized Access Devices) $(18 \text{ U.S.C. } \S 1029(a)(3), 2)$

Between on or about May 10, 2022, and on or about June 1, 2022, in the District of Oregon and elsewhere, SOMPHACHANH ARB SOPHANTHAVONG knowingly and with intent to defraud, possessed counterfeit or unauthorized access devices as defined in subsection (e)(2) and subsection (e)(3), to wit: documents containing personal identifying information of others, documents containing financial identifying information of others, fraudulently obtained debit and credit cards and numbers, real identity cards, and other similar items, said possession affecting interstate and foreign commerce.

In violation of Title 18, United States Code, section 1029(a)(3).

COUNT 2

(Keys or Locks Stolen or Reproduced) (18 U.S.C. §§ 1704, 2)

Between on or about May 10, 2022, and on or about June 1, 2022, in the District of Oregon and elsewhere, SOMPHACHANH ARB SOPHANTHAVONG knowingly and unlawfully made, forged and

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Page 1 Revised April 2018 counterfeited, or possessed a key adopted by the Postal Service and in use on bags containing mail, a lock box or other authorized receptacle for the deposit of mail matter, with the intent unlawfully and improperly to use, sell or dispose of the same.

In violation of 42 U.S.C. §§ 1704 and 2.

COUNT 3
(Possession of Stolen Mail)
(18 U.S.C. §§ 1708, 2)

Between on or about May 10, 2022, and on or about June 1, 2022, in the District of Oregon and elsewhere, SOMPHACHANH ARB SOPHANTHAVONG did knowingly and unlawfully have in his or her possession a piece of mail which had been stolen, taken, embezzled and abstracted from a letter box or mail receptable which was an authorized depository for mail matter, knowing that the said letter to have been stolen, taken, embezzled and abstracted from an authorized depository for mail matter.

All in violation of 18 U.S.C. §§ 1708 and 2.

Dated.

3/12/24

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

NATALIE K. WIGHT United States Attorney

RACHEL K. SOWRAY, OSB #095159

Special Assistant United States Attorney

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